

EXHIBIT A

Holland & Knight

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July 28, 2020

*Via E-mail (brandon@boulware-law.com; jeremy@boulware-law.com;
matt@williamsdirks.com; aaiken@susmangodfrey.com)*

Brandon J.B. Boulware
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Boulware Law LLC
1600 Genessee, Suite 416
Kansas City, MO 64102

Matt Dameron
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Alex Aiken
Susman Godfrey L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101

Re: *Sitzer, et al. v. NAR et al.*, Case No. 4:19-cv-00332-SRB (W.D. Mo.)
Production of KWRI_009

Dear Brandon, Jeremy, Matt, and Alex:

In connection with the above-referenced matter, Keller Williams Realty, Inc. (“Keller Williams”) is providing by Secure File Transfer access to documents numbered KWRI_00465837 through KWRI_00466430.

Consistent with our past email correspondence, including our agreement reached on April 2, 2020, and discussions in our meet and confer on July 23, 2020, this constitutes a production of documents arising from KWRI’s reasonable inquiry to its Missouri franchisees (“Market Centers”) regarding whether Market Centers maintain certain “central-file” documents related to commissions, the alleged “Challenged Restraints,” NAR rules, or participation in NAR, local associations, or MLSs (or encouragement of the same). These are documents that KWRI’s Market Centers provided voluntarily, based on our agreement that these are the only documents Plaintiffs will seek from them. As discussed, in producing these materials, KWRI does not concede – and continues to

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Alex Aiken
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contest – that it exercises control over its Market Centers or that it maintains custody, possession, or control over documents maintained by its Market Centers.

This production includes the following:

MARKET CENTER	BATES RANGE
Keller Williams Realty Chesterfield	KWRI_00465837 – 00465971
Keller Williams Realty Southwest	KWRI_00465971 – 00466030
Keller Williams Realty Springfield	KWRI_00466031 – 00466127
Keller Williams Realty St. Louis	KWRI_00466128 – 00466238
Keller Williams Realty Southland Partners	KWRI_00466239 – 00466251
Keller Williams Realty West	KWRI_00466252 – 00466302
Keller Williams Realty Partners	KWRI_00466303 – 00466430

The password for the production is: [REDACTED]

Sincerely yours,

HOLLAND & KNIGHT LLP



David C. Kully